

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN (SOUTHERN DIVISION)

NEVIN P. COOPER-KEEL, JR.

Plaintiff,

vs.

GARRETT KEEL-WORRELL,

Defendant.

Case No. 1:22-cv-01236-HYJ-SJB

Hon. Hala Y. Jarbou, Presiding

Hon. Sally J. Berens, Referral

ORAL ARGUMENT NOT REQUESTED

Nevin P. Cooper-Keel, Jr.
Plaintiff in pro per
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**DEFENDANT'S RESPONSE TO PLAINTIFF'S
EX-PARTE MOTION FOR LEAVE TO AMEND PLEADINGS**

NOW COMES, Defendant, Garrett Keel-Worrell, by and through his attorneys, Kreis, Enderle, Hudgins & Borsos, P.C. and for his Response to Plaintiff Nevin Cooper-Keel's "Ex-Parte" Motion for Leave to Amend Pleadings ("Motion") as follows:

1. A situation has arisen, which I've accurately predicted since the filing of my initial complaint in this matter, because I'm just an honest person, trying to live in peace and freedom and quiet enjoyment of such: the 'hunters harassment' malicious prosecution that Defendant orchestrated against me has been motioned to be dismissed by the Allegan County Prosecutor. (Exhibit 1).

RESPONSE: The Defendant denies the allegations set forth in Paragraph 1 of the Motion as factually untrue.

2. In my journeys through the portal of being the victim of malicious prosecutions, *iner alia* [sic], I can't in good faith let it go on any longer without having its day in court.

RESPONSE: The Defendant denies the allegations set forth in Paragraph 2 of the Motion as factually untrue.

3. My claim against Defendant for malicious prosecution has just become ripe.

RESPONSE: The Defendant denies the allegations set forth in Paragraph 3 of the Motion as factually untrue.

4. Defendant has a motion for summary disposition which was filed on or about February 27th, 2023, which I'm presently obligated to respond to.

RESPONSE: The Defendant admits the allegations set forth in Paragraph 4 of the Motion.

5. Unlike Defendant, I have important things to do for the good of USA and humanity.

RESPONSE: The Defendant denies the allegations set forth in Paragraph 5 as factually untrue.

6. It would cause me irreparable harm to waste my resources responding to Defendant's motion for summary disposition, only to later amend my pleadings and probably have to respond to the same frivolous motion.

RESPONSE: The Defendant denies the allegations set forth in Paragraph 6 as factually untrue.

7. Conceivably, one could say that I could be made whole from that being awarded costs.

RESPONSE: The Defendant lacks the knowledge of information sufficient to form a belief as to the allegations set forth in Paragraph 7 of the Motion for the reason that such allegations are vague and unintelligible.

8. However, I'm just a little pro se fish, swimming in a sea of sharks, and I don't have the resources to be wasted responding twice to something, whilst having to write new pleadings at the same time.

RESPONSE: The Defendant lacks the knowledge of information sufficient to form a belief as to the allegations set forth in Paragraph 8 of the Motion for the reason that such allegations are vague and unintelligible.

9. Given the circumstances of this case, I think it would be most fair and avert irreparable harm to me to give me a couple weeks to amend my pleadings to reflect the present situation of my malicious prosecution claim and surrounding claims and circumstances of that.

RESPONSE: The Defendant denies the allegations set forth in Paragraph 9 of the Motion as factually untrue.

WHEREFORE, the Defendant respectfully requests that this Court deny the relief requested in the Motion, award the Defendant his attorney fees and costs associated with responding to the Motion, and award any additional relief the Court deems just and proper.

Respectfully Submitted,

KREIS ENDERLE
HUDGINS & BORSOS

Dated: March 17, 2023

/s/ Sara E.D. Fazio
Sara E.D. Fazio (P62046)
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